

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Glenwood Comm School District (25110000)
SNP - Review ID: 5023

Program Year: 2019
Month of Review: December
Lead Reviewer: Brenda Windmuller
Org Representative(s): Terry Marlow

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	<p>Assessment of Wellness Policy was not completed. Completed assessment is required to be made public.</p> <p>The district is required have a wellness committee guiding policy and practice. The SFA should invite stakeholders to participate in the wellness committee. Stakeholders should include: parents, teachers of physical education, school administrators, students, school health professionals, general public, school food service and school board members. Attendance records and meeting minutes should be kept.</p>	<p>The SFA will 1. Submit a timeline and plan on when the school district will be assessed on the implementation of the Local School Wellness Policy 2. Explain how it will make the assessment available to the public. (Include web address if applicable.) 3. Submit a list of the wellness committee members and their association with the district (teacher, parent, community member, etc.) 4. Submit a date for the next wellness committee meeting.</p>	

Site - Level Findings: Glenwood Senior High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

Org - Level Technical Assistance

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Area	Question	Comments
700 - Resource Management		<p>PROCUREMENT: Effective July 1, 2018, the federal micro-purchase threshold was increased from \$3,500 to \$10,000 and the small purchase threshold was increased from \$150,000 to \$250,000. The local small purchase threshold should be \$250,000. The threshold of \$135,000 is only for public improvement projects. Update the thresholds in the procurement plan. The Code of Conduct policy did not identify the district policy related to disciplinary action should an employee violate their job duties. These policy number and title is 408.1 <i>Staff Personnel Conflicts of Interest</i>.</p> <p>Donuts were procured for the School Breakfast Program (SBP) as well as catering services. Except for the types of donuts, no other clear description was provided to inform the vendor that meal pattern requirements require at a minimum a whole grain-rich product. No information was requested for grain/bread requirement for a serving of donut. Nutritional information received from vendor should be part of the procurement records.</p> <p>In addition to the weekly estimated quantities of each donut type per building the solicitation, the annual estimated quantities for each donut type should be provided to ensure extended pricing is calculated to select the correct vendor.</p> <p>The Buy American Provision should be included in the procurement of food products including donuts, dairy, breads, and produce. In addition, the solicitation should provide a procedure when vendor requests SFA accept an alternative domestic product if the product ordered is not available. If the SFA does not accept the domestic alternative and decides to purchase a non-domestic item, this exception should follow USDA requirements as stated in USDA memo SP 38-2017: <i>Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program</i> issued on June 30, 2017. An exception log should be maintained.</p>

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1000 - Local School Wellness Policy		<p>WELLNESS POLICY: The Wellness Assessment was not complete and was not made available to the public. Regulation dictates that the assessment must be completed at least once every three years (once a year is best practice) and made available to the public. While a wellness committee exists, evidence was not provided that they are playing an active role. It is the responsibility of the Wellness Committee to meet regularly, set wellness objectives, spearhead activities, assess the completion of the goals at the end of the school year, review the Wellness Policy and otherwise lead the culture of Wellness. The committee should include faculty, staff, parents, students and community members.</p> <p>SA provided the Local Wellness Policy folder from Team Nutrition that includes the handout on the Summary of the LWP Final Rule, the "Does Your Wellness Policy Measure Up?" handout and the school Building Progress Report form. We also discussed ideas to inject some energy into the program including polling faculty and staff to see what is already happening in the district to better guide where improvement is needed. We discussed breaking the committee into sub committees to give each a focused area or objective to work on. Each subcommittee would report back to the larger committee regularly on their progress. This will assign responsibility to individuals with the expectation of follow-through. The Wellness Committee should report to the school board once a year on the progress that they have made.</p>
RMCR - Nonprofit School Food Srvc Acct	3 Did the SFA's net cash resources exceed its 3 month average monthly expenses?	TA was given that the School Lunch Account may not have more than 3 months of operating expense in the account at any given time. The FSD has good ideas of how to spend down the money to include equipment purchases. The SFA should refer to the pre-approved equipment list before purchasing any piece of equipment over \$5000. If the item is not on the pre-approved list, the SFA must receive permission from the SA before purchasing.

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Site - Level Technical Assistance Glenwood Senior High School (0109)

Area	Question	Comments
800 - Civil Rights	812 Did meal service observations on the day of review indicate that program benefits were made available to all children without discrimination?	Per Iowa House File 2467, Food Service Staff may not communicate to students a negative balance or the need to supply money for the school lunch account in a way which draws attention or embarrasses the student. All communication on this issue is to be directed to the parents.

Org - Level Commendations

Description
APPLICATIONS/BENEFIT ISSUANCE (100): Benefit documents, as well as all paperwork, were extremely well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. All applications were correctly determined, applications were complete with SSN's and case numbers, and all applications were determined within ten days. The SFA utilizes an electronic system which creates efficiencies within the office. Access to benefit information is correctly limited. Free meals are extended to all members in the household.
BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast with reminder signs, and promotions during National School Breakfast Week. The SFA also hosts monthly pancake breakfasts, rotating between the 4 sites. The Food Service staff along with the superintendent reach out to students, reminding them to come in early for breakfast on these days and these individuals work with the staff to prepare and serve the pancakes. Menus are posted in each cafeteria as well as the website. Summer Food Service Program outreach is shared via websites, lunch menus, newsletters, flyers and signs.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants. Students with diet modifications have been reasonably accommodated.
COMPETITIVE FOODS & SMART SNACKS (1100): Students may purchase a second entrée and other a la carte items at the high school. Documentation was available to show that all foods and beverages sold to students by the food service department during the school day met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte by the food service department.
LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included. The policy is posted on the district's web site, making it available to the public as required.
MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of December appeared accurate and complete. Food Service Staff ensured each student received the required meal components.
MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, and Assistant Food Service Director, do an excellent job of menu planning and offering choices. There is good meal participation at all sites. Part of that is due to the numerous choices which increases participation and provides opportunities for each student to find meal components for lunch that they will eat. High school students have at least three daily entrée choices and multiple fruit and vegetables to select from. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production contained

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the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file and well organized. Standardized recipes are used for food production. Water was available as required. Many low fat and low sodium food items were observed in storage.

On-site Monitoring (900): The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st.

PROCUREMENT: The Food Service Director (FSD) attended regional procurement training in Council Bluffs. The school food service procurement plan for SY 2018-2019 is completed includes procurement events. Correct procurement methods are identified based on the estimated value of each event. The Code of Conduct policy is included in the procurement plan. A review of vendor documentation to determine compliance with micro-purchase method showed each transaction was below the micro-purchase threshold, the purchase price was reasonable.

PROFESSIONAL STANDARDS (1200): Tracking was provided that documents that the Food Service Director received the required 12 hours of annual training, managers received the required 10 hours of training, full time staff have received 6 hours of training and all other staff have received at least 4 hours of annual training. There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented.

RESOURCE MANAGEMENT (700): The resource management section of the off-site assessment tool was completed on time. Receipts were reviewed and indicated appropriate and allowable expenditures. Reports are filed on time, and all records are maintained for at least three years plus the current year. Errors fell below the \$600 disregard, no fiscal action is required at this time.

The SFA has great signage daily to include two white boards with the daily menu written on it, trays taped to the windows in the hallway leading to the cafeteria showing students what their options are for the day, trays at each serving station with sample foods showing students what a reimbursable meal looks like, and one site has TVs which highlight the daily menu. The FSD is working to install the TVs at the other sites.

VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification.

Site - Level Commendations Glenwood Senior High School (0109)

Description
HACCP/FOOD SAFETY (1400): The SFA has a district-wide written Food Safety plan that includes required elements. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and dishwasher. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Multiple members of the Food Service staff are ServSafe certified.
OFFER VS SERVE: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable. Cafeteria staff have been trained on offer vs. serve. There is signage explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable at breakfast and lunch.
The FSD brings great energy and creativity to the district. He and the Assistant Food Service Director complement each other in their skill sets and work well tighter. The FSD has vision for cross training and succession planning, both necessary to keep the program moving forward. Site Managers appear to be empowered to run their site with the support of the FSD and AFSD. Each Site Manager has additional duties which support the program as a whole. The FSD takes every opportunity to train staff and present team building exercises. This is a positive work environment with a focus on customer service.